

1 Miles N. Clark, Esq.
2 Nevada Bar No. 13848
3 Law Offices of Miles N. Clark, LLC
4 5510 So. Fort Apache Rd, Suite 30
5 Las Vegas, NV 89148
6 Telephone: (702) 856-7430
7 Fax: (702) 447-8048

8 Michael F. Ram (*Pro Hac Vice*)
9 Marie N. Appel (*Pro Hac Vice*)
10 MORGAN & MORGAN COMPLEX
11 LITIGATION GROUP
12 711 Van Ness Avenue, Suite 500 San
13 Francisco, CA 94102
14 Telephone: (415) 358-6913
15 Facsimile: (415) 358-6293
16 Email: MRam@forthepeople.com
17 Email: MAppel@forthepeople.com

18 Benjamin R. Osborn (*Pro Hac Vice*)
19 102 Bergen Street Brooklyn, NY 11201
20 Telephone: (347) 645-0464
21 Email: Ben@benosbornlaw.com

22 *Counsel for Plaintiffs*

COHEN-JOHNSON, LLC
H. Stan Johnson, Esq. (SBN: 0265)
(sjohnson@cohenjohnson.com)
375 E. Warm Springs Road, Suite 104
Las Vegas, Nevada 89119
Telephone: (702) 823-2500
Facsimile: (702) 823-3400

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Shon Morgan (*Pro Hac Vice*)
(shonmorgan@quinnemanuel.com)
John W. Baumann (*Pro Hac Vice*)
(jackbaumann@quinnemanuel.com)
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Cristina Henriquez (*Pro Hac Vice*)
(cristinahenriquez@quinnemanuel.com)
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5000

*Counsel for ANCESTRY.COM
OPERATIONS INC., ANCESTRY.COM INC.,
and ANCESTRY.COM LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

23 ANTHONY SESSA and MARK SESSA, *on*
24 *behalf of themselves and all others similarly*
25 *situated,*

26 Plaintiffs,

27 v.

28 ANCESTRY.COM OPERATIONS INC., a
Virginia Corporation; ANCESTRY.COM
INC., a Delaware Corporation; and
ANCESTRY.COM LLC, a Delaware Limited
Liability Company,
Defendants.

Case No.: 2:20-cv-02292-GMN-BNW

**JOINT STIPULATION FOR ORDER
APPROVING EXTENSION OF CLASS
CERTIFICATION DEADLINES AND
[PROPOSED] ORDER**

(SECOND REQUEST)

1 Pursuant to L.R. IA 6-1 and 6-2, and L.R. 7-1 and 26-3 of the Local Rules of Practice for
2 the United States District Court for the District of Nevada, all plaintiffs Anthony Sessa and Mark
3 Sessa (“Plaintiffs”) and defendants Ancestry.com Operations Inc., Ancestry.com Inc., and
4 Ancestry.com LLC (“Defendants” or “Ancestry”) (collectively, the “parties”), by and through their
5 undersigned counsel, hereby stipulate and agree to extend the class certification briefing deadlines
6 set by the Orders at ECF Nos. 64 and 99, and specifically, to extend the deadlines to oppose and
7 reply to Plaintiffs’ Motion for Class Certification which was filed on December 6, 2022. The
8 requested extension is necessary and there is good cause for the extension, as set forth below. This
9 is the second request for an extension of the class certification briefing schedule and is sought in
10 good faith and not for purposes of causing any undue delay.

11 WHEREAS, on May 16, 2022, the Court approved the parties’ Amended Joint Discovery
12 Plan setting the close of fact discovery for October 25, 2022 and the last day to move to certify a
13 class as November 29, 2022, (ECF Nos. 62, 64);

14 WHEREAS, on November 17, 2022, the parties jointly requested a one-week extension of
15 the class certification briefing deadlines, to permit the parties time to complete document
16 production and review (ECF No. 96);

17 WHEREAS, on November 18, 2022, the Court granted the parties’ stipulation, making the
18 deadline for Plaintiffs to move to certify a class December 6, 2022, and the deadline for Ancestry
19 to oppose the motion to certify a class January 17, 2023 (ECF No. 99);

20 WHEREAS, on December 6, 2022 Plaintiffs filed the Motion for Class Certification (ECF
21 No. 103);

22 WHEREAS, Ancestry gave notice to Plaintiffs of its intent to take the deposition of
23 Plaintiffs’ expert identified in support of Plaintiffs’ Motion for Class Certification, and the parties
24 met and conferred and agreed that Ancestry will take the deposition of Plaintiffs’ expert on January
25 26, 2023;

1 WHEREAS, good cause exists as required by L.R. 26-3 to grant this brief extension of the
 2 class certification opposition deadline to allow Ancestry time to take the deposition of Plaintiffs'
 3 expert prior to opposing the Motion for Class Certification;

4 WHEREAS, Ancestry and Plaintiffs stipulate and agree, subject to the Court's approval,
 5 to extend the deadline to oppose the Motion for Class Certification to February 2, 2023, and the
 6 deadline to file a reply supporting the Motion for Class Certification to March 2, 2023 (four weeks
 7 after the opposition deadline).

8 WHEREFORE, the parties hereby seek an Order of this Court extending the class
 9 certification deadlines as follows.:

10 Event	Current Deadline	Proposed Deadline
11 Last Day to Oppose Motion to Certify Class	January 17, 2023	February 2, 2023
12 Last Day to File Reply Supporting Motion to Certify 13 Class	February 14, 2023	March 2, 2023

IT IS SO STIPULATED.

DATED this 28th Day of December, 2022

**LAW OFFICES OF MILES N. CLARK,
LLC**

/s/ Miles N. Clark

Miles N. Clark, Esq., SBN 13848
5510 So. Fort Apache Rd, Suite 30
Las Vegas, NV 89148

*Counsel for Plaintiffs and the Proposed
Class*

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**


/s/ John W. Baumann

John W. Baumann (*Pro Hac Vice*)
jackbaumann@quinnemanuel.com
Shon Morgan (*Pro Hac Vice*)
shonmorgan@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017

*Counsel for Defendants Ancestry.com
Operations Inc., Ancestry.com Inc., and
Ancestry.com LLC*

ORDER APPROVING STIPULATION

IT IS SO ORDERED.



Hon. Brenda Weksler
UNITED STATES MAGISTRATE JUDGE

DATED: January 9, 2023